

EXHIBIT B

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October 4, 2019

Julieta V. Lozano, SAUSA
Christopher J. DiMase, AUSA
Nicholas S. Folly, AUSA
United States Attorney's Office
Southern District of New York
One Saint Andrews Plaza
New York, NY 10007

Re: *United States v. Mark S. Scott*, S6 17 Cr. 630(ER)

Dear Nick, Chris, and Julieta:

We write on behalf of our client, Mark Scott, with respect to the Superseding Indictment returned yesterday, October 3, 2019. Please advise us as soon as possible whether you will provide us with the following limited particulars:

1. The names of the known co-conspirators for Count One;
2. The names of the known co-conspirators for Count Two;
3. The identity of the financial institution or institutions that were objects of the "scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC")" (18 U.S.C. 1344(1));
4. The identity of any "such financial institution" from whom the conspirators sought to obtain "moneys, funds, credits, assets, securities, and other property" (18 U.S.C. 1344(2)); and,
5. The "material facts" that "Scott and others misrepresented and omitted" that are alleged to have "caused...FDIC financial institutions in the United States to transfer funds into and out of accounts associated with purported investment funds operated by Scott and others."

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In view of the upcoming trial date, we intend to make an application for particulars on Monday, October 7, 2019 for any particulars you do not agree to provide.

Respectfully Submitted,

/s Arlo Devlin-Brown
Arlo Devlin-Brown

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